Federal Operating Permit
Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Philip Morris USA, Inc.
Facility Name:	Philip Morris USA, Inc. – Manufacturing Center
Facility Location:	3601 Commerce Road Richmond, Virginia
Registration Number:	50076
Permit Number:	PRO50076

_January 1, 2005_____
Effective Date

_December 31, 2009_____
Expiration Date

_____
Robert G. Burnley, Director, Department of Environmental Quality

_____
Signature Date

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I. Facility Information

Permittee
Philip Morris USA, Inc.
P. O. Box 26603
Richmond, Virginia 23261

Responsible Official
Ms. Deborah J. Weber
Vice President and General Manager, Richmond Manufacturing

Facility
Philip Morris USA, Inc. – Manufacturing Center
3601 Commerce Road
Richmond, Virginia

Contact Person
Mr. Anthony P. Puglisi
Staff Engineer
(804) 274-3467

AFS Identification Number: 51-760-0308

Facility Description: SIC Code Description: Major Group 21: Tobacco Products - Tobacco is processed and flavored and cigarettes are manufactured at the Philip Morris USA Incorporated (PMUSA Inc.) Manufacturing Center in Richmond, Virginia under SIC Code 2111. At the Manufacturing Center facility, the Bright, Burley, Oriental and Sheet tobacco is unpacked from containers and conditioned to obtain optimum moisture levels and separate clumps. A portion of the tobacco is diverted and undergoes an expansion treatment. Flavoring is added and the tobacco is cut into strips and dried. The Expanded tobacco and Scrap tobacco is added, flavoring is applied to the final tobacco blend and it is sent to storage. Cigarette filters are made and are sent to the cigarette-making machines. The blended tobacco is sent from storage to the machines. The cigarettes are then made and packaged. At the Flavor Center facility, liquid flavors are mixed in vessels and dry flavors are blended. The completed flavor materials are packed out for use at PMUSA Inc. facilities.

II. Emission Units

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
Fuel Burning Equipment							
BO0101	AE-01B	Central Plant Package Boiler No. 1 (natural gas and #2 fuel oil) - Combustion Engineering - Pre 1974	143.5 mmBTU/hr (maximum continuous rate (MCR))	Joy Multicyclone (80% efficient)	SD0101	Part	
BO0201	AE-02B	Central Plant Package Boiler No. 2 (natural gas and #2 fuel oil) - Combustion Engineering - Pre 1974	143.5 mmBTU/hr (MCR)	Joy Multicyclone (80% efficient)	SD0201	Part	
BO0301	AE-06B	VU-40 PC Boiler (pulverized coal and #2 oil)-Combustion Engineering - 1974	172.5 mmBTU/hr (MCR)	Universal Oil Products, Co. (UOP) Model #20(6996)24-1-4 Electrostatic Precipitator (hot side, high voltage, four field) 98% efficient	PE0101	Part	
HX0301	Fugitive	12 Coal Car thawing (#2 oil) burners Series 6856 North American Mfg Co.-1977	5.1 mmBTU/hr total	None			
FU0301 FU0401	AE-41 AE-32	Furnaces (natural gas and #2 oil) - 1999	6.77 mmBTU/hr each	None			
Emergency Generators							
EG0101C		Diesel Emergency Generator - 1973	675 kW	None			
PU0101C		Diesel Emergency Fire Pump -1973	255 hp	None			
PU0102C		Diesel Emergency Fire Pump -1973	255 hp	None			
Ash Handling							
AH0101	AE-05 AE-07	Ash Handling System (including ash transport system and storage silo)-1974	1,800 lb/hr ash	Filter bags and baghouse filter (99.0% efficient)	SF0101 BH0101	Part	

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
Charcoal Handling System							
TP1401 TP0801 TP1501	AE-91 AE-92 AE-J1	Pneumatic Transport System - 1996	4,160 lb/hr	One four-segment baghouse filter (99.0% efficient) and two baghouse filters (99.0% efficient)	BH3401 BH3402 BH3403 BH3404 BH3501 BH6001	Part	
Dust Collection/Housekeeping Vacuum							
CN0601 CN0602 CN0603	AE-E3 AE-H7	Housekeeping Vacuum System 1996	720lbs/hr	Three baghouse filters (99.0% efficient)	BH3801 BH3802 BH5901 BH0801 BH0802 BH0803 BH0901 BH7001	Part	
TP1101	AE-57 AE-59 AE-63 AE-J3 AE-J4 AE-J5	Pneumatic Transport System 1974, 1997	2,160 lb/hr	Twelve baghouse filters (99.5% efficient)	BH1701 BH3201 BH3202 BH3203 BH6201 BH6301 BH6401	Part	
MAHVSU	AE-P1 AE-P2 AE-P3 AE-P4 AE-P5 AE-P8\ AE-P9	Housekeeping vacuum system – 1997, 2003	32,000	Seven baghouse filters (99.0% efficient)	BH1001 BH1101 BH1401 BH7101 BH7201 BH6501 BH6601	Part	
CN 0701	AE-F4	Housekeeping Vacuum System - 1999	200 lbs/hr	Baghouse filter (99.0% efficient)	BH4201	Part	
CN0901	AE-G5	Housekeeping Vacuum System - 2001	200 lbs/hr	Baghouse filter (99.0% efficient)	BH5301	Part	
CN1001	AE-J8	Housekeeping Vacuum System - 2003	100 lbs/hr	Baghouse filter (99.0% efficient)	BH7301	Part	

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
Tobacco Processing							
TP3001	AE- P6	Pneumatic Transport System - to be built	31.4 TPA units/hr	Baghouse filter (99.5% efficient)	BH6901	Part	
DC1001	AE- P7	Mechanical Transport System - to be built	188.4 TPA units/hr	Baghouse filter (99.5% efficient)	BH8001	Part	
PC0101 PC0201	AE- 24	Conditioning Chambers - 1974	36,000 lbs/hr	None			
CS0101 CS0201 CS0301	AE- 45 AE- 46 AE- 47	Conditioning Cylinders -1995	75,000 lbs/hr total	Three rotoclone scrubbers (90.0% efficient)	SR0101 SR0201 SR0301	Part	
CS0401 CS0501	AE- 43 AE- 40	Conditioning Cylinders – 1974	49,000 lbs/hr total	Two rotoclone scrubbers (90.0% efficient)	SR0401 SR0501	Part	
SP0101	AE- 14	Pneumatic separators – 1974	25,000 lbs/hr	Two baghouse filters (99.5% efficient)	BH0101 BH0102	Part	
SP0901 SP1001 SP1102	AE- E7 AE- E8 AE- E9	Pneumatic separators - 1997	81,000 lbs/hr	Three Baghouse filters (99.5% efficient)	BH4101 BH4102 BH4103	Part Part Part	
CS0901	AE- H8	Liquid application and conditioning cylinder – 1996	20,000 lbs/hr	Rotoclone scrubber (90.0% efficient)	SR2601	Part	
OC0301 OC0401 CO0301 CO0401	AE- E4	Conditioning chamber and conveyor – 1996	14,000 lbs/hr	Wet scrubber (90.0% efficient for particulate; 40.0% efficient for VOC)	SC0301	Part VOC	
CO0101 CO0201	AE- 34 AE- 35	Conveyors - 1983	14,000 lbs/hr	Two wet scrubbers (90.0% efficient for particulate; 40.0% efficient for VOC)	SC0101 SC0201	Part VOC	
SM0402	AE- H5	Mechanical separator - 1996	7000 lbs/hr	Baghouse filter (99.5% efficient)	BH5701	Part	
SM0502	AE- H6	Mechanical separator - 1996	7000 lbs/hr	Baghouse filter (99.5% efficient)	BH5801	Part	

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
PP0101 OC0301 OC0401	AE- G8	Mechanical Transport system – 1997	14,000 lbs/hr	Baghouse filter (99.5% efficient)	BH5601	Part	
FC0101 FC0201 FC0301 FC0401 DA0101	AE- 16 AE- 17 AE- 26 AE- 18 AE- 25	Liquid application cylinders - 1992	60,000 lbs/hr	Four rotoclone scrubbers (90.0% efficient)	SR0901 SR0801 SR0701 SR0601	Part	
DA0201 DA0301 DA0401	AE- 22 AE- 19 AE- 15	Steam dryers - 1992	60,000 lbs/hr	None	--	–	
CC0101 CC0301	AE- 42	Liquid application cylinders - 1974	30,000 lbs/hr	Two rotoclone scrubbers (90.0% efficient)	SR1001 SR1201	Part	
CC0201 CC0401	AE- 42	Liquid application cylinders – 1974	30,800 lbs/hr	Two rotoclone scrubbers (90.0% efficient)	SR1101 SR1301	Part	
CS0601 CS0701	AE- 70	Conditioning cylinders - 1974	68,000 lbs/hr	Two rotoclone scrubbers (90.0% efficient)	SR2701 SR1401	Part	
SM0901	AE- 58	Mechanical separating system - 1990	10,000 lb/hr	Two baghouse filters (99.5% efficient)	BH1501 BH1601	Part	
SP0201 SP0301 SP0401	AE- E2	Pneumatic separators - 1996	19,000 lbs/hr	Baghouse filter (99.0% efficient)	BH3701	Part	
SP0801	AE-F5	Pneumatic separator - 1999	20,000 lbs/hr	Baghouse filter (99.0% efficient)	BH3901	Part	
DR0101 DR0201 DR0301 DR0401	AE- 48 AE- 49	Steam dryers - 1982, 1984, 1985	100,000 lbs/hr	Four rotoclone scrubbers (90% efficient for particulate) followed by two incinerators (90.0% efficient for particulate, 95% efficient for VOC)	SR1801 SR1701 SR1601 SR1501 IN0101 IN0201	Part Part VO(	

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
TP0201	AE-L1 AE-L2 AE-L3 AE-L4 AE-L5 AE-L6 AE-L7 AE-L8 AE-L9 AE-M1 AE-M2 AE-M3 AE-M4 AE-J2 AE-J6 AE-J7	Pneumatic transport system – 1974, 1997	72,000 lbs/hr	Sixteen baghouse filters (99.5% efficient)	BH2001 BH2002 BH2003 BH2101 BH2102 BH2103 BH2201 BH2202 BH2301 BH2302 BH2602 BH2603 BH2604 BH6101 BH6701 BH6801	Part	
FC0501 FC0502 FC0601 FC0602 FC0701 FC0702 FC0801 FC0802	AE-48 AE-49	Liquid application cylinders - 1993, 1995	200,000 lbs/hr	Four rotoclone scrubbers (90% efficient for particulate) followed by two incinerators (90.0% efficient for particulate, 95% efficient for VOC)	SR1901 SR2001 SR2101 SR2201 IN0101 IN0201	Part Part VOC	
VS0101	Plenum AE-63	Mechanical separating system - 1990	10,000 lb/hr	Baghouse filter (99.5% efficient)	BH0701	Part	
AF0101	AE-G2	Liquid application chamber - 2002	1,850 lbs/hr and 10 gal/hr	None	--	–	
FA0101	Fugitive	Liquid application machine - 2002	7 gal/hr	None	--	–	
TP2801	AE-G3 AE-G4 AE-G7	Pneumatic transport system - 2002	2,460 lbs/hr	Three baghouse filters (99.0% efficient)	BH5101 BH5201 BH5501	Part	
VS0901	AE-G6	Mechanical separating system – to be built	1320 lbs/hr	Baghouse filter (99.0% efficient)	BH5401	Part	

Emission Unit ID	Stack ID	Emission Unit Description - Manufacturer - Date of Construction	Size / Rated Capacity*	Pollution Control Device Description (PCD)*	PCD ID	Polli Con	
Flavor Center							
CR0101 CR0201 CR0301 CR0401 CR0501	Fugitive	Liquid application machines (under construction)	211 lb/hr	None			
TP0101F	AE- 19	Pneumatic transport system - 1990	12,000 lbs/hr	Baghouse filter (99.0% efficient)	BH0101 F	Part	
Other Processes							
CH0101	Bin Vent	Coal Unloading & Handling Operations	100 tons/hr	None	--	–	
TP0101	AE- 56	Pneumatic transport system - 1995	35,800 lb/hr	Baghouse filter (99.0% efficient)	BH0601	Part	
DC0101	AE- 89	Mechanical transport system - 1995	510 lb/hr	Baghouse filter (99.0% efficient)	BH3101	Part	
CF0601	AE- K2 AE- K3	Mechanical separating system - 1992	7200 units/hr	Baghouse filter (99.5% efficient) vents indoors	BH7401 BH7501	Part	

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an ap requirement.

III. Fuel Burning Equipment Requirements

Package Boilers (BO0101 & BO0201), PC Boiler (BO0301), Furnaces (FU0301, FU0401), Coal Car Thawing Burners (HX0301), Diesel Emergency Generator (EG0101C), and Diesel Emergency Fire Pumps (PU0101C, PU0102C)

A. Limitations

1. **Construction** - Construction of the PC Boiler (BO0301) is to be conducted as proposed in the application signed on September 24, 1974 as well as the supplemental letter dated September 27, 1974.
(9 VAC 5-50-390 and 9 VAC 80-1210 D and Condition #1 of the November 25, 1974 permit)

2. **Construction** - Installation and operation of the Coal Car Thawing burners (HX0301) is to be conducted as proposed in the August 2, 1977 submittal.
(9 VAC 5-50-390 and 9 VAC 80-1210 D and Condition #1 of the 9/22/1977 permit)

3. **Emission Controls** - Particulate Matter emissions from the PC Boiler (BO0301) shall be controlled by an Electrostatic Precipitator (PE0101). The Electrostatic Precipitator shall be provided with adequate access for inspection.
(9 VAC 5-50-260 and the 9/24/1974 application)

4. **Fuel** - The Package boilers (BO0101 & BO0201) and Furnaces (FU0301, FU0401) are designed to use natural gas and #2 fuel oil. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-1180)

5. **Fuel** - The PC boiler (BO0301) is designed to use pulverized coal and no. 2 fuel oil (for startup). If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-1180 and the 11/25/1974 permit and application)

6. **Fuel** - The coal car thawing burners (HX0301) are designed to use no. 2 fuel oil. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-1180 and Condition #3 of the 9/22/77 permit)

7. **Emission Limits** - Emissions from the operation of each of the package boilers (BO0101 & BO0201) shall not exceed the limits specified below:

Particulate Matter	0.30	lbs/mmBTU	43.1	lb/hr
Sulfur Dioxide			378.9	lb/hr

(9 VAC 5-40-900, 5-40-930 and 9 VAC 5-80-110)

8. **Emission Limits** - Emissions from the operation of the PC boiler (BO0301) shall not exceed the limits specified below:

Particulate Matter	0.29	lbs/mmBTU	50.0	lb/hr
Sulfur Dioxide			455.4	lbs/hr

(9 VAC 5-40-900, 5-40-930 and 9 VAC 5-80-110)

9. **Emission Limits** - Emissions from the operation of each of the Furnaces (fuel burning contribution only for FU0301, FU0401) shall not exceed the limits specified below:

Particulate Matter	0.6	lbs/mmBTU	4.1	lb/hr
Sulfur Dioxide			17.9	lbs/hr

(9 VAC 5-40-900, 9 VAC 5-40-930 and 9 VAC 5-80-110)

10. **Visible Emissions** - Visible emissions from the fuel-burning equipment (BO0301, HX0301, FU0301, FU 0401) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-50-80, and 9 VAC 5-80-110)

11. **Visible Emissions** - Visible emissions from the fuel-burning equipment (BO0101, BO0201) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 60 percent opacity.
(9 VAC 5-40-940, and 9 VAC 5-80-110)

12. **Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the boilers shall be operated in compliance with the requirements of 40 CFR 63 subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial/ Commercial/Institutional Boilers and Process Heaters no later than September 13, 2007.
(9 VAC 5-50-400 and 9 VAC 5-80-110)

B. Monitoring

1. Compliance with the particulate emission standard as indicated by 9 VAC 5-40-900 will be monitored through good operation and maintenance of the fuel burning installation.
(9 VAC 5-80-110)

2. Compliance with the sulfur dioxide emission standard as indicated by 9 VAC 5-40-930 will be monitored through good operation and maintenance of the fuel burning installation.
(9 VAC 5-80-110)

3. Visible emissions checks shall be conducted for each fuel burning equipment unit at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any above normal visible emissions. If above normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

C. Recordkeeping and Reporting

1. The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the requirements of Sections III.A, III.B, and XI.A of this permit. These records are:

   a. The annual consumption of fuel calculated monthly as the sum of each consecutive 12-month period.

   b. The annual hours of operation for the emergency generator (EG0101C) and diesel fire pumps (PU0101, PU0102) tabulated monthly as the sum of each consecutive 12-month period.

   c. Records of visible emission observations.

   (9 VAC 5-80-110)

2. The permittee shall obtain and maintain records of a certification, or alternative statement, from the fuel supplier covering each shipment of

coal or distillate oil. Each fuel supplier certification or alternative statement shall include the following:

a. The name of the fuel supplier

b. The results of the analyses of the fuel including sulfur content and ash content (for coal)

c. The methods used to determine the properties of the fuel.

(9 VAC 5-80-110)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations. (9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9
VOC	EPA Methods 18, 25, 25a
NOx	EPA Method 7
SO2	EPA Method 6
CO	EPA Method 10

(9 VAC 5-80-110)

IV. Process Equipment Requirements - Emergency Generator and Diesel Fire Pumps (EG0101C, PU0101C, PU0102C)

A. Limitations

1. **Fuel** - The emergency generator (EG0101C), and diesel fire pumps (PU0101C, PU0102C) are designed to use no. 2 fuel oil. If it becomes necessary to change the type of fuel the Board must approve the change prior to its use.
(9 VAC 5-80-1180)

2. **Operating Hours -** The emergency generator (EG0101C) and diesel fire pumps (PU0101C, PU0102C) shall each operate no more than 500 hours/yr, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and 5-80-1320 B)

3. **Visible Emissions** - Visible emissions from the emergency generator (EG0101C) and diesel fire pumps (PU0101C, PU0102C) shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity.
(9 VAC 5-50-80, and 9 VAC 5-80-110)

B. Monitoring

1. Compliance for the emergency generator and the fire pumps shall be to keep a log of operating hours on a monthly basis.
(9 VAC 5-80-110)

2. Visible emissions checks shall be conducted for each emergency generator unit (EG0101C, PU0101C, PU0102C) at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any above normal visible emissions. If above normal visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the requirements of Sections IV.A, and IV.B of this permit.
(9 VAC 5-80-110)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9
VOC	EPA Methods 18, 25, 25a
NOx	EPA Method 7
SO2	EPA Method 6
CO	EPA Method 10

V. Process Equipment Requirements - Ash Handling and Coal Handling Operations

(AH0101, CH0101)

A. Limitations

1. **Emission Limit** - Emissions from the operation of the ash handling equipment (AH0101) and coal handling equipment (CH0101) shall not exceed the limits specified below:

Unit Ref. No.	Allowable Particulate Matter Emissions
AH0101	3.8 lbs/hr
CH0101	51.3 lbs/hr

(9 VAC 5-40-260 and 9 VAC 5-80-110)

2. **Visible Emissions** - Visible emissions from the ash-handling stacks (AE-05 and AE-07) and the coal handling bin vent shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity. This standard applies at all times, except for periods of start-up, shutdown, and malfunction.
(9 VAC 5-50-20, 9 VAC 5-50-80 and 9 VAC 5-80-110)

3. Fugitive Dust Emissions Control - Fugitive dust and fugitive emission controls shall include the following, or equivalent, as a minimum:

   a. Dust from material handling, and load-outs, shall be controlled by wet suppression or equivalent (as approved by the DEQ).

   b. All material being stockpiled shall be kept adequately moist to control dust during storage and handling or covered at all times to minimize emissions.

   c. Dust from haul roads and traffic areas shall be controlled by the application of asphalt, water, suitable chemicals, or equivalent methods approved by the DEQ.

   (9 VAC 5-50-90 and text of the 9/22/1977 permit)

B. Monitoring

The permittee shall perform inspections of the ash and coal handling equipment to determine the presence of above normal visible emissions. Visible emissions checks shall be conducted at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any above normal visible emissions. If above normal visible emissions are

observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no above normal visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with the requirements of Sections V.A and V.B of this permit. These records shall include the results of the weekly visible emissions observations as required by V.B and any corrective action taken.
(9 VAC 5-80-110)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9

(9 VAC 5-80-110)

VI. Process Equipment Requirements - Pneumatic Transport System TP0801, TP1401, TP1501

A. Limitations

1. **Emission Controls** - Total Suspended Particulate and PM-10 emissions from the Pneumatic Transport System (TP0801, TP1401, TP1501) shall be controlled by a fabric filter.
   (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. **Throughput -** The throughput of dry material to TP0801, TP1401, TP1501 shall not exceed 18,220 tons per year, calculated as the sum of each consecutive 12-month period.
   (9 VAC 5-80-1180 and Condition 21 of the 8/9/2004 as amended 10/12/2004 permit)

3. **Emissions -** Emissions from the operation of the permitted process equipment indicated below shall not exceed the limits specified:

Ref. No	Particulate		PM-10	
	lbs/hr	tons/yr	lbs/hr	tons/yr
TP0801, TP1401, TP1501	0.8	3.6	0.8	3.6

   (9 VAC 5-50-260 and Condition 30 of the 8/9/2004 as amended 10/12/2004 permit)

4. **Visible Emissions -** Unless otherwise indicated, visible emissions from each exhaust stack emission point at the permitted facility shall not exceed 5% opacity as determined by EPA Method 9 (reference: 40 CFR 60, Appendix A).
   (9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 34 of the 8/9/2004 as amended 10/12/2004 permit)

B. Monitoring

1. Each fabric filter required in VI.A.1 shall be equipped with a device to continuously measure the differential pressure drop through the fabric filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
   (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. Visible emissions checks shall be conducted for the fabric filter at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to

1. The monthly throughput of dry material to TP0801, TP1401, TP1501 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

2. The monthly log of fabric filter visible emissions observations.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50 and Condition 35 of the 8/9/2004 as amended 10/12/2004 permit)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations.
(9 VAC 5-50-30 and 9 VAC 5-80-110 and Condition 8 of the 8/9/2004 as amended 10/12/2004 permit)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9

(9 VAC 5-80-110)

VII. Process Equipment Requirements - HousekeepingVacuums CN0601, CN0602, CN0603, MAHVSU, CN0701, CN0901, CN1001

A. Limitations

1. **Emission Controls -** Total Suspended Particulate and PM-10 emissions from the following equipment shall be controlled by a fabric filter:

Ref. No.	Description
CN0601,CN0602,CN0603	Housekeeping Vacuum System
MAHVSU	Housekeeping Vacuum System
CN0701	Housekeeping Vacuum System
CN0901	Housekeeping Vacuum System
CN1001	Housekeeping Vacuum System

Each fabric filter shall be provided with adequate access for inspection. (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. **Throughput -** The throughput of dry material to CN0601, CN0602, and CN0603, shall not exceed 1,892 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 24 of the 8/9/2004 as amended 10/12/2004 permit)

3. **Throughput** - The throughput of dry material to MAHVSU shall not exceed 221 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 25 of the 8/9/2004 as amended 10/12/2004 permit)

4. **Throughput** - The throughput of dry material to CN0701 shall not exceed 316 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 26 of the 8/9/2004 as amended 10/12/2004 permit)

5. **Throughput** - The throughput of dry material through CN0901 shall not exceed 146 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 27 of the 8/9/2004 as amended 10/12/2004 permit)

6. **Throughput** - The throughput of dry material through CN1001 shall not exceed 263 tons per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 28 of the 8/9/2004 as amended 10/12/2004 permit)

7. **Emissions -** Emissions from the operation of the permitted process equipment which exhausts to the following stack numbers shall not exceed the limits specified:

Ref. No.	Particulate		PM-10	
	lbs/hr	tons/yr	lbs/hr	tons/yr
CN0601, CN0602, CN0603	1.4	3.8	0.4	1.0
MAHVSU	12.1	2.2	3.1	0.6
CN0701	0.4	0.7	0.1	0.5
CN0901	0.4	0.3	0.1	0.1
CN1001	0.2	0.6	0.1	0.2

(9 VAC 5-50-260 and Condition 30 of the 8/9/2004 as amended 10/12/2004 permit)

8. **Visible Emissions -** Unless otherwise indicated, visible emissions from each exhaust stack emission point at the permitted facility shall not exceed 5 percent opacity as determined by EPA Method 9 (reference: 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 34 of the 8/9/2004 as amended 10/12/2004 permit)

B. Monitoring

1. Each fabric filter required in VII.A.1 shall be equipped with a device to continuously measure the differential pressure drop through the fabric filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. Visible emissions checks shall be conducted for each fabric filter at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-50-50 F and 9 VAC 5-80-1180)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

1. The monthly throughput of dry material through the CN0601, CN0602, CN0603 at the permitted facility (which is based on the predicted weight of the material collected by the fabric filter), including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

2. The monthly throughput of dry material to the MAHVSU at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

3. The monthly throughput of dry material through CN0701 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

4. The monthly throughput of dry material to CN0901, including a summary sheet clearly indicating a running total of debris throughput for each consecutive 12-month period.

5. The monthly throughput of dry material to CN1001, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

6. The monthly log of fabric filter visible emissions observations. (9 VAC 5-80-110)

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-50-50 and Condition 35 of the 8/9/2004 as amended 10/12/2004 permit)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations. (9 VAC 5-50-30, 9 VAC 5-80-110 and Condition 8 of the8/9/2004 as amended 10/12/2004 permit)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9

(9 VAC 5-80-110)

VIII. Process Equipment Requirements - Tobacco Processing

TP3001, DC1001, PC0101, PC0201, CS0101, CS0201, CS0301, CS0401 CS0501, SP0101, SP0901, SP1001, SP1101, CS0901, OC0301 OC0401, CO0301, CO0401, CO0101, CO0201, SM0402, SM0502, PP0101, FC0101, FC0201, FC0301, FC0401, DA0101, DA0201, DA0301, DA0401, CC0101 CC0301, CC0201 CC0401, CS0601, CS0701, DR0101, DR0201, DR0301, DR0401, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802, VS0101, TP0201, TP1101, SM0901, SP0201, SP0301, SP0401, SP0801, AF0101, FA0101, TP2801, VS0901

A. Limitations:

1. **Emission Controls** - Total Suspended Particulate and PM-10 emissions from the following equipment shall be controlled by rotoclone cyclone scrubbers:

Ref. No.	Description
CS0101, CS0201, CS0301, CS0401, CS0501	Conditioning Cylinders
CS0901	Liquid Application and Conditioning Cylinder
FC0101, FC0201, FC0301, FC0401	Liquid Application Cylinders
CC0101, CC0301, CC0201, CC0401	Liquid Application Cylinders
CS0601,CS0701	Conditioning Cylinders

Each scrubber shall be provided with adequate access for inspection. (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 3 of the 8/9/2004 as amended 10/12/2004 permit)

2. **Emission Controls -** Total Suspended Particulate and PM-10 emissions from the following equipment shall be controlled by a fabric filter:

Ref. No.	Description
TP3001	Pneumatic Transport System
DC1001	Mechanical Transport System
SM0402, SM0502	Mechanical Separators
VS0101	Mechanical Separating System
TP0201	Pneumatic Transport System
SM0901	Mechanical Separating System
TP1101	Pneumatic Transport System
TP2801	Pneumatic Transport System
SP0101	Pneumatic Separators
SP0201, SP0301, SP0401	Pneumatic Separators
SP0801	Pneumatic Separator
SP0901, SP1001, SP1101	Pneumatic Separators
VS0901	Mechanical Separating System
OC0301, OC0401, PP0101	Mechanical Transport System

Each fabric filter shall be provided with adequate access for inspection. (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

3. **Emission Controls** - Total Suspended Particulate, PM-10 and VOC emissions from the following equipment shall be controlled by scrubbers:

Ref. No.	Description
CO0101, CO0201, CO0301, CO0401, OC0301, OC0401	Conditioning Chambers and Conveyors

Each scrubber shall be provided with adequate access for inspection. (9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 5 of the 8/9/2004 as amended 10/12/2004 permit)

4. **Emission Controls -** Total Suspended Particulate, PM-10 and VOC emissions from the following equipment shall be controlled by Thermal Oxidizers:

Ref. No.	Description
DR0101, DR0201, DR0301, DR0401	Steam Dryers
FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802	Liquid Application Cylinders

Each Thermal Oxidizer shall have a demonstrated Volatile Organic Compound destruction efficiency of at least 95% on a mass basis. Each Thermal Oxidizer shall operate at an average temperature of 1370^{o}F and a minimum retention time of 0.5 second. The Thermal Oxidizer temperatures shall be averaged on a three-hour rolling period. Any three-hour averages that are 50^{o}F below the required 1370^{o}F shall be recorded, for each day, for each line and an explanation provided for the reduction in temperature. Valid 3-hour averages shall consist of no less than 90% valid readings. This information shall be maintained at the facility for the most recent five years. Notification of a malfunction shall be given in accordance with the SAPCB Regulations. The Thermal Oxidizers shall be equipped with automatic control dampers which prevent the flow of VOC laden process exhaust air to each Thermal Oxidizer until the minimum temperature is attained. Additionally, the Thermal Oxidizers shall be interlocked with the process equipment and process exhaust fans such that during process startup tobacco shall not be processed until the Thermal Oxidizer minimum temperature is attained. The chamber temperatures and automatic damper positions shall be continuously monitored and recorded. All continuous monitoring devices shall be maintained and calibrated in accordance with manufacturer's specifications. The exhaust systems to the Thermal Oxidizers shall be

equipped with pressure gauges in the duct prior to each Thermal Oxidizer to insure that a negative pressure is being maintained in each exhaust system. Each Thermal Oxidizer shall be provided with adequate access for inspection.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 6 of the 8/9/2004 as amended 10/12/2004 permit)

5. **Emission Controls** - Volatile Organic Compound emissions from all tobacco processing equipment other than the DR0101, DR0201, DR0301, DR0401, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801 and FC0802 shall be controlled by using tobacco flavorings which have negligible volatility.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 7 of the 8/9/2004 as amended 10/12/2004 permit)

6. **Throughput** - The throughput of Bright Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 78,600 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 9 of the 8/9/2004 as amended 10/12/2004 permit)

7. **Throughput** - The throughput of Burley Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 131,400 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 10 of the 8/9/2004 as amended 10/12/2004 permit)

8. **Throughput** - The throughput of Expanded Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 52,560 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 11 of the 8/9/2004 as amended 10/12/2004 permit)

9. **Throughput** - The throughput of Oriental Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 56,300 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 12 of the 8/9/2004 as amended 10/12/2004 permit)

10. **Throughput** - The throughput of Scrap Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 25,000 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 13 of the 8/9/2004 as amended 10/12/2004 permit)

11. **Throughput** - The throughput of Sheet Tobacco in the Pre-blend Area of the Manufacturing Center shall not exceed 105,000 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 14 of the 8/9/2004 as amended 10/12/2004 permit)

12. **Production** - The total production of Blended Tobacco at the Manufacturing Center shall not exceed 315,400 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 15 of the 8/9/2004 as amended 10/12/2004 permit)

13. **Throughput** - The throughput of ethanol as Volatile Organic Compounds contained in the flavoring, casing, and spray materials used at the Manufacturing Center shall not exceed 4,550 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 16 of the 8/9/2004 as amended 10/12/2004 permit)

14. **Throughput** - The throughput of dry material through SM0901, shall not exceed 43,800 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 18 of the 8/9/2004 as amended 10/12/2004 permit)

15. **Throughput** - The throughput of dry material through TP1101 shall not exceed 9,460 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 17 of the 8/9/2004 as amended 10/12/2004 permit)

16. **Throughput** - The throughput of dry material to TP3001, shall not exceed 275.2 TPB units per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 22 of the 8/9/2004 as amended 10/12/2004 permit)

17. **Throughput** - The throughput of dry material to DC1001, shall not exceed 418.46 TPB units per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 23 of the 8/9/2004 as amended 10/12/2004 permit)

18. **Emissions** - Emissions from the operation of the permitted process equipment indicated below shall not exceed the limits specified:

Ref. No	Particulate		PM-10		Volatile Organic Compounds	
	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
SP0101	0.1	0.5	0.1	0.5	3.2	13.8
DA0101, DA0201, DA0301, DA0401	6.8	29.2	1.6	7.2	31.6	138.4
FC0101, FC0201, FC0301, FC0401	1.2	4.0	0.4	2.0	8.4	35.2
PC0101, PC0201	0.1	0.5	0.1	0.5	0.4	1.4
CC0101, CC0301	1.2	5.3	0.3	1.3	4.1	18.2
CC0201, CC0401	1.2	5.3	0.3	1.3	8.6	38.1
CS0101	0.1	0.5	0.1	0.5	0.3	1.0
CS0201	0.1	0.5	0.1	0.5	0.3	1.0
CS0301	0.1	0.5	0.1	0.5	0.3	1.0
CS0401	0.3	1.1	0.1	0.5	4.1	17.3
CS0501	0.3	1.1	0.1	0.5	3.8	16.7
CS0601, CS0701	0.1	0.5	0.1	0.5	0.6	2.6
CS0901	0.3	0.8	0.1	0.2	1.0	2.7
SM0402	0.3	1.2	0.1	0.3	3.8	16.2
SM0502	0.3	1.2	0.1	0.3	3.8	16.2
SM0901	1.5	6.6	0.4	1.6	-	-
TP3001	0.4	1.8	0.1	0.5	-	-
DC1001	1.5	1.7	0.4	0.4	-	-
VS0101	1.6	7.1	0.4	1.8	3.6	16.0
DR0101, DR0201, DR0301, DR0401, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801, FC0802	0.1	0.6	0.1	0.5	28.9	126.4
CO0101, CO0201, CO0301, CO0401, OC0301, OC0401	0.6	2.3	0.2	0.6	1.9	7.0
OC0301, OC0401, PP0101	1.8	6.7	0.5	1.7	-	-
SP0201, SP0301, SP0401	0.1	0.5	0.1	0.1	-	-
SP0801	0.2	0.4	0.1	0.1	-	-
SP0901, SP1001, SP1101	0.5	1.3	0.1	0.5	6.4	19.0
TP0201	3.0	12.9	0.7	3.2	-	-
TP1101	2.2	9.5	0.5	2.4	-	-
AF0101	-	-	-	-	0.5	1.5
TP2801	1.0	4.3	1.0	4.3	-	-
VS0901	0.3	1.2	0.3	1.2	-	-

(9 VAC 5-50-260 and Condition 30 of the 8/9/2004 as amended 10/12/2004 permit)

19. **Emission Limits** - Fugitive emissions from the operation of the equipment associated with the August 9, 2004 permit (as amended October 12, 2004) shall not exceed the limits specified below:

Volatile Organic Compounds	481.0	lbs/hr	627.0	tons/yr

(9 VAC 5-50-260 and Condition 31 of the 8/9/2004 as amended 10/12/2004 permit)

20. **Emission Limits** - Regardless of the emission limits imposed in conditions VIII.A.17 and 18 of this permit, emissions from the operation of the equipment associated with the August 9, 2004 permit (as amended October 12, 2004) shall not exceed the limits specified below:

Particulate Matter	50.0	lbs/hr	61.1	tons/yr
PM-10	19.1	lbs/hr	33.7	tons/yr
Volatile Organic Compounds	549.9	lbs/hr	721.0	tons/yr

(9 VAC 5-50-260 and Condition 32 of the 8/9/2004 as amended 10/12/2004 permit)

21. **Visible Emissions -** Unless otherwise indicated, visible emissions from each exhaust stack emission point in the August 9, 2004 permit (as amended October 12, 2004) shall not exceed 5 percent opacity as determined by EPA Method 9 (reference: 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 34 of the 8/9/2004 as amended 10/12/2004 permit)

22. **Relocation of Equipment within Plant -** Equipment may be relocated or changed within the plant provided the system air movement capacity, expressed as the cubic feet per minute of air, and maximum control efficiency of the control system are not decreased.
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 33 of the 8/9/2004 as amended 10/12/2004 permit)

B. Monitoring

1. Each scrubber required in VIII.A.1 shall be equipped with a flow meter to measure water flow to the scrubber.
(9 VAC 5-80-110 and Condition 3 of the 8/9/2004 as amended 10/12/2004 permit)

2. Each fabric filter required in VIII.A.2 shall be equipped with a device to continuously measure the differential pressure drop through the fabric

filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-110and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

3. Each scrubber required in VIII.A.3 shall be equipped with a water flow meter and a device to continuously measure the differential pressure through the scrubber.
(9 VAC 5-80-110 and Condition 5 of the 8/9/2004 as amended 10/12/2004 permit)

4. Visible emissions checks shall be conducted for each scrubber and fabric filter exhaust at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

5. The chamber temperatures and automatic damper positions for the Thermal Oxidizers required in VIII.A.4 shall be continuously monitored and recorded hourly. All continuous monitoring devices shall be maintained and calibrated in accordance with manufacturer's specifications. The exhaust systems to the Thermal Oxidizers shall be equipped with pressure gauges in the duct prior to each Thermal Oxidizer to insure that a negative pressure is being maintained in each exhaust system.
(9 VAC 5-80-110 and Condition 6 of the 8/9/2004 as amended 10/12/2004 permit)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

a. The monthly throughput of Bright Tobacco, Burley Tobacco, Expanded Tobacco, Oriental Tobacco, Scrap Tobacco, and Sheet Product

processed in the Pre-blend Area of the permitted facility, including a summary sheet clearly indicating a running total of each type of tobacco throughput for each consecutive 12-month period.

b. The monthly production of Blended Tobacco produced at the permitted facility, including a summary sheet clearly indicating a running total of tobacco production for each consecutive 12-month period.

c. The monthly throughput of dry material through SM0901 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.

d. Monthly log of scrubber and fabric filter visible emissions observations. (9 VAC 5-80-110)

e. Thermal Oxidizer chamber temperature and automatic damper position records.

f. Operating schedules for DR0101, DR0201, DR0301, DR0401, DR0501, FC0501, FC0502, FC0601, FC0602, FC0701, FC0702, FC0801 indicating all operating and downtime hours for each for each calendar day. Schedules shall be recorded weekly and shall be kept in close proximity to the Thermal Oxidizer chamber temperature and automatic damper position records.

g. The permittee shall maintain records of all DEQ approved emission factors and calculations to show compliance with the emission limits/standards for the Tobacco Processing Equipment. (9 VAC 5-80-110)

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-50-50 and Condition 35 of the 8/9/2004 as amended 10/12/2004 permit)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports will be provided at the appropriate locations. (9 VAC 5-50-30 and 9 VAC 5-80-110 and Condition 8 of the 8/9/2004 as amended 10/12/2004 permit)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9
VOC	EPA Methods 18, 25, 25a

(9 VAC 5-80-110)

IX. Process Equipment Requirements - Flavor Applications CR0101, CR0201, CR0301, CR0401, CR0501, TP0101F

A. Limitations

1. **Emission Controls** - Particulate emissions from the mechanical blending and packing system (TP0101F) shall be controlled by a baghouse. The baghouse shall be provided with adequate access for inspection and shall be in operation when the mechanical blending and packing system (TP0101F) is operating.
   (9 VAC 5-80-110 and Condition 3 of the 9/15/2004 permit)

2. **Control Efficiency** - The baghouse associated with TP0101F shall maintain a control efficiency for particulate emissions of no less than 99 percent demonstrated by Conditions IX.A.8 and 16.
   (9 VAC 5-50-260 and Condition 4 of the 9/15/2004 permit)

3. **Throughput -** The annual throughput of dry cigarette flavor ingredients to TP0101F shall not exceed 23,000 tons, calculated monthly as the sum of each consecutive 12-month period.
   (9 VAC 5-80-1180 and Condition 5 of the 9/15/2004 permit)

4. **Annual Throughput** - The throughput of liquid solution to the five liquid application machines shall not exceed 660 tons per year, calculated monthly as the sum of each consecutive 12-month period.
   (9 VAC 5-80-110 and Condition 3 of the 8/17/2004 permit)

5. **Emission Limits -** Emissions from the operation of the mechanical blending and packing system shall not exceed the limitations specified below:

Particulate Matter	1.5	lbs/hr	2.8	tons/yr
PM-10	1.5	lbs/hr	2.8	tons/yr

   These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number IX.A.3.
   (9 VAC 5-50-260 and Condition 6 of the 9/15/2004 permit)

6. **Emission Limits** - Emissions from the operation of the five liquid application machines (ref. no. CR-01-01, CR-02-01, CR-03-01, CR-04-01, CR-05-01) shall not exceed the limits specified below:

Volatile Organic Compounds	2.8 lbs/hr	8.8 tons/yr

Exceedance of the operating limits shall be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Condition number IX.A.4 and 7.
(9 VAC 5-80-110 and Condition 4 of the 8/17/2004 permit)

7. **Visible Emissions -** Visible emissions from TP0101F shall not exceed 5% opacity.
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 7 of the 9/15/2004 permit)

B. Monitoring

Visible emissions checks shall be conducted for each fabric filter at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.

(9 VAC 5-80-110 and Condition 8 of the 9/15/2004 permit)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

1. Annual throughput of dry flavor ingredients to TP0101F. Annual throughput shall be calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 9 of the 9/15/2004 permit)

2. Annual throughput of liquid solution to the five liquid application machines, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-110 and Condition 5 of the 8/17/2004 permit)

3. Scheduled and unscheduled maintenance, and operator training.
(9 VAC 5-80-110, Condition 9 of the 9/15/2004 permit and Condition 5 of the 8/17/2004 permit)

4. Monthly log of fabric filter visible emissions observations.
(9 VAC 5-80-110 and Condition 9 of the 9/15/2004 permit)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Test ports shall be provided at the baghouse discharge.
(9 VAC 5-80-110,Condition 10 of the 9/15/2004 permit and Condition 6 of the 8/17/2004 permit)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9
VOC	EPA Methods 18, 25, 25a

(9 VAC 5-80-110)

X. Process Equipment Requirements - Other Processes (Pneumatic Transport System TP0101, Mechanical Transport System DC0101 and Mechanical Separating System CF0601)

A. Limitations

1. **Emission Controls** - Total Suspended Particulate and PM-10 emissions from the following equipment shall be controlled by a fabric filter:

Ref. No.	Description
TP0101	Pneumatic Transport System
DC0101	Mechanical Transport System
CF0601	Mechanical Separating System

Each fabric filter shall be provided with adequate access for inspection.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. **Throughput** - The throughput of dry material to TP0101 shall not exceed 15,600 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 19 of the 8/9/2004 as amended 10/12/2004 permit)

3. **Throughput** - The throughput of dry material to DC0101 shall not exceed 2,230 tons per year, calculated as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 20 of the 8/9/2004 as amended 10/12/2004 permit)

4. **Throughput** - The throughput toCF0601 shall not exceed 20 million units per year, calculated monthly as the sum of each consecutive 12-month period.
(9 VAC 5-80-1180 and Condition 29 of the 8/9/2004 as amended 10/12/2004 permit)

5. **Emissions** - Emissions from the operation of the permitted process equipment indicated below shall not exceed the limits specified:

Ref. No	Particulate		PM-10	
	lbs/hr	tons/yr	lbs/hr	Tons/yr
TP0101	7.2	6.2	7.2	6.2
DC0101	0.1	0.5	0.1	0.5
CF0601	0.3	0.4	0.1	0.1

(9 VAC 5-50-260 and Condition 30 of the 8/9/2004 as amended 10/12/2004 permit)

6. **Visible Emissions -** Unless otherwise indicated, visible emissions from each exhaust stack emission point at the permitted facility shall not exceed 5% opacity as determined by EPA Method 9 (reference: 40 CFR 60, Appendix A).
(9 VAC 5-50-80, 9 VAC 5-50-260 and Condition 34 of the 8/9/2004 as amended 10/12/2004 permit)

B. Monitoring

1. Each fabric filter required in X.A.1 shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. Each device shall be installed in an accessible location and shall be maintained by the permittee such that it is in proper working order at all times.
(9 VAC 5-80-1180, 9 VAC 5-50-260 and Condition 4 of the 8/9/2004 as amended 10/12/2004 permit)

2. Visible emissions checks shall be conducted for each fabric filter at least monthly during periods of normal facility operation for a sufficient time interval to determine if there are any visible emissions. If visible emissions are observed, a visible emissions evaluation (VEE) in accordance with 40 CFR Part 60, Appendix A, Method 9 shall be conducted. The VEE shall be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until a total of sixty minutes of observation has been completed. A Method 9 evaluation shall not be required if the visible emissions condition is corrected in a timely manner such that no visible emissions are present; the emissions unit is operating at normal operating conditions; and the cause and corrective measures taken are recorded.
(9 VAC 5-80-110)

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include, but are not limited to:

1. The monthly throughput of dry material to TP0101 and DC0101 at the permitted facility, including a summary sheet clearly indicating a running total of dry material throughput for each consecutive 12-month period.
(9 VAC 5-50-50 and Condition 35 of the 8/9/2004 as amended 10/12/2004 permit)

2. The monthly throughput of units through CF0601, including a summary sheet clearly indicating a running total of the number of units throughput for each consecutive 12-month period.
   (9 VAC 5-50-50 and Condition 35 of the 8/9/2004 as amended 10/12/2004 permit)

3. The monthly log of fabric filter visible emissions observations.
   (9 VAC 5-80-110)

D. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.
   (9 VAC 5-80-1180, 9 VAC 5-80-110 and Condition 8 of the 8/9/2004 as amended 10/12/2004 permit)

2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Methods 22, 9

(9 VAC 5-80-110)

XI. Facility Wide Conditions

A. Limitations

1. **Notification for Control Equipment Maintenance** - The permittee shall furnish notification to the Director, Piedmont Regional Office of the intention to shut down or bypass, or both, air pollution control equipment for necessary scheduled maintenance, which results in excess emissions for more than one hour, at least 24 hours prior to shutdown. The notification shall include, but is not limited to, the following information:

   a. Identification of the air pollution control equipment to be taken out of service, as well as its location, and registration number;

   b. The expected length of time that the air pollution control equipment will be out of service;

   c. The nature and quantity of emissions of air pollutants likely to occur during the shutdown period;

   d. Measures that will be taken to minimize the length of the shutdown or to negate the effect of the outage.

   (9 VAC 5-80-110, Condition 10 of the 8/17/2004 permit)

2. **Notification for Facility or Control Equipment Malfunction** – The permittee shall furnish notification to the Director, Piedmont Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but not later than four daytime business hours of the malfunction. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of the occurrence. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Piedmont Regional Office in writing.
   (9 VAC 5-80-110, Condition 40 of the 8/9/2004 as amended 10/12/2004 permit, and Condition 11 of the 9/17/2004 permit)

3. **Maintenance/Operating Procedures** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment which affect such emissions:

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a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

b. Maintain an inventory of spare parts.

c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9 VAC 5-50-20 E, Condition 5 of the 8/17/2004 permit, and Condition 41 of the 8/9/2004 as amended 10/12/2004 permit)

4. **Violation of Ambient Air Quality Standard** – The permittee shall, upon request of the DEQ, reduce the level of operations or shutdown the facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-80-110, and Condition 12 of the 8/17/2004 permit)

5. **Registration Update -** Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate; process and production data; changes in control equipment; and operating schedules. Such requests for information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.1-340 through 2.1-348 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information

provided to federal officials is subject to appropriate federal laws and regulations governing confidentiality of such information.
(9 VAC 5-80-110, Condition 43 of the 8/9/2004 as amended 10/12/2004 permit and Condition 16 of the 8/17/2004 permit)

B. Monitoring

Monitoring shall be conducted as specified under Sections III through X of this permit.

C. Recordkeeping and Reporting

The permittee shall maintain records of all emission data and operating parameters necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Director, Piedmont Region. These records shall include all information as specified under Sections III through X of this permit. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110, 9 VAC 5-50-50)

D. Testing

1. **Testing/Monitoring Ports** – The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods. Test ports shall be provided at the appropriate locations.
   (9 VAC 5-80-110, Condition 8 of the 8/9/2004 as amended 10/12/2004 permit, and Condition 6 of the 8/17/2004 permit)

2. The permit does not require the source to test. The Department and US EPA has authority to require testing not included in this permit if necessary to determine compliance with any applicable emission limit or standard. The table of test methods is included below:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Methods 18, 25, 25a
PM/PM10	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

XII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Regulatory Basis	Pollutant Emitted	Rated Capacity
IM0201, IM0202 IM0301, IM0303	Treatment Chambers	5-80-720 B	VOC, PM, PM10	
CO0501	Conveyors	5-80-720 B	VOC, PM, PM10	
CF0401 to CF0404 VC0101, VC0102	Mechanical Separators	5-80-720 B	VOC, PM, PM10	
CF0101 to CF0105 CF0201 to CF0205	Cutters	5-80-720 B	PM, PM10	
CF0301 to CF0303	Cutters	5-80-720 B	PM, PM10	
TP3101	Pneumatic Transport System	5-80-720 B	PM, PM10	
TP3201	Pneumatic Transport System	5-80-720 B	PM, PM10	
EG0101	LPG Emergency Generator (DM Warehouse)	5-80-720 C		60 kW (80 hp)
EG0201	LPG Emergency Generator (SB Warehouse)	5-80-720 C		45 kW (60 hp)
EG0301	LPG Emergency Generator (Security Gate K)	5-80-720 C		15 kW (20 hp)
EG0401	LPG Emergency Generator (Security Gates C and D)	5-80-720 C		30 kW (40 hp)
EG0501	LPG Emergency Generator (Security Gate M)	5-80-720 C		15 kW (20 hp)
EG0701	LPG Emergency Generator (ASRS)	5-80-720 C		45 kW (75 hp)
EG0101F	Diesel Emergency Generator (Flavor Center)	5-80-720 C		300 kW (402 hp)
HX1001	Electric (Parts Glue Removal) Dryer	5-80-720 B	PM, PM10	
EV0101	Electric (Parts Rinse Water) Concentrator	5-80-720 B	VOC	
Various	Shop Parts Washers	5-80-720 B	VOC	
Various	Parts Sandblasters	5-80-720 B	PM, PM10	
EH0201	Paint Spray Booth	5-80-720 B	VOC, PM, PM10	
IP0101	Ink Press (Water-based)	5-80-720 B	VOC	
Various	Flavor Tanks	5-80-720 B	VOC	
Various	Glue (Adhesive), and Plasticizer Tanks	5.80-720 B	VOC	

Emission Unit No.	Emission Unit Description	Regulatory Basis	Pollutant Emitted	Rated Capacity
TK0101	Underground Alcohol Storage Tank	5-80-720 B	VOC	20,000 gallons
TK0102	Underground Alcohol Storage Tank	5-80-720 B	VOC	20,000 gallons
Various	Hydraulic Oil Tanks	5-80-720 B	VOC	
Various	Diesel Day Tanks	5-80-720 B	VOC	
TK0301C	No.2 Fuel Oil Storage Tank (Central Plant)	5-80-720 B	VOC	148,000 gallons
TK0302C	No.2 Fuel Oil Storage Tank (Central Plant)	5-80-720 B	VOC	148,000 gallons
TK0601C	Underground Diesel Storage Tank (Central Plant)	5-80-720 B	VOC	15,000 gallons
TK2501B	No.2 Fuel Oil Storage Tank (PC Boiler Plant)	5-80-720 B	VOC	15,000 gallons
Various	Flavor Tanks – Flavor Center	5-80-720 B	VOC	
Various	Flavor Mixing Hoods – Flavor Center	5-80-720 B	VOC, PM, PM10	
TK0301F	Underground Alcohol Storage Tank – Flavor Center	5-80-720 B	VOC	12,000 gallons
Various	Various Foil Packaging	5-80-720 B	VOC	

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

XIII. Permit Shield and Inapplicable Requirements

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
40 CFR 63 Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines	Generator EG0101C is for emergency use only and is therefore exempt from the requirements of the RICE MACT

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

XIV. General Conditions

A. Federal Enforceability

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110 N)

B. Permit Expiration

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.

2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.

3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.

4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.

5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

C. Recordkeeping and Reporting

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

   a. The date, place as defined in the permit, and time of sampling or measurements.

   b. The dates analyses were performed.

   c. The company or entity that performed the analyses.

   d. The analytical techniques or methods used.

   e. The results of such analyses.

   f. The operating conditions existing at the time of sampling or measurement.

   (9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
   (9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

   a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.

   b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

      (1) Exceedance of emissions limitations or operational restrictions;

      (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic

monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,

(3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110 F)

D. Annual Compliance Certification

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.

2. The identification of each term or condition of the permit that is the basis of the certification.

3. The compliance status.

4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.

5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.

6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

E. Permit Deviation Reporting

The permittee shall notify the Director, Piedmont Regional Office, within four daytime business hours of any discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition **XIV.C.3.** of this permit.
(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

F. Failure/Malfunction Reporting

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Piedmont Region by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Piedmont Region.
(9 VAC 5-20-180 C)

G. Severability

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110 G.1)

H. Duty to Comply

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110 G.2)

I. Need to Halt or Reduce Activity not a Defense

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110 G.3)

J. Permit Modification

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-190 and 9 VAC 5-80-260)

K. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110 G.5)

L. Duty to Submit Information

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
   (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
   (9 VAC 5-80-110 K.1)

M. Duty to Pay Permit Fees

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department.
(9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

N. Fugitive Dust Emission Standards

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;

4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,

5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

O. Startup, Shutdown, and Malfunction

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a

manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9 VAC 5-50-20)

P. Alternative Operating Scenarios

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1.
(9 VAC 5-80-110 J)

Q. Inspection and Entry Requirements

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions -related activity is conducted, or where records must be kept under the terms and conditions of the permit.

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.

3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.

4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

R. Reopening For Cause

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months

after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.

1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

S. Permit Availability

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-150 E)

T. Transfer of Permits

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-160)

2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-160)

U. Malfunction as an Affirmative Defense

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the conditions of paragraph 2 are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:

   a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.

   b. The permitted facility was at the time being properly operated.

   c. During the period of malfunction, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit.

   d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.

3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.

4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any requirement applicable to the source.

(9 VAC 5-80-250)

V. Permit Revocation or Termination for Cause

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable

requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe, any permit for any of the grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

W. Duty to Supplement or Correct Application

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-80 E)

X. Stratospheric Ozone Protection

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(40 CFR Part 82, Subparts A-F)

Y. Accidental Release Prevention

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(40 CFR Part 68)

Z. Changes to Permits for Emissions Trading

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110 I)

AA. Emissions Trading

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.

2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)

XV. State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

1. Odor.

   None.

2. Emission Standard for Toxic Pollutants

   The facility shall operate in compliance with 9 VAC 5-60, Article 4 and Article 5. No changes in the facility that increase emission of any non-criteria pollutant or cause the emission of additional non-criteria pollutants shall be made without the prior written approval of the Board. (9 VAC 5-80-110)

3. Other:

   The TSP limits were changed to PM (TSP) so as to reflect the Virginia PSD regulation definition of Particulate Matterr as PM (TSP) for the significance levels used in PSD determinations and in other parts of the state regulations. PM (TSP) includes PM10 in all the limitations in the NSR permit and Draft Title V permit.

(9 VAC 5-80-110 N and 9 VAC 5-80-300)